

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:	)	Bankruptcy No. 20-22898-CMB
	)	
Ronald G. Linaburg,	)	
	)	
<u>Debtor,</u>	)	Chapter 11
	)	
Ronald G. Linaburg,	)	
	)	Document No.
Movants,	)	
	)	
v.	)	
	)	
No respondents.	)	

**DEBTOR’S MOTION TO APPROVE MUTUAL RELEASE AGREEMENT**

AND NOW comes the Debtor, by and through his counsel, Brian C. Thompson, Esquire, Thompson Law Group, P.C., and files this Motion to Approve Mutual Release Agreement (“Motion”), and respectfully represents as follows:

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding within the meaning of 28 U.S.C. §§ 157(b)(2). Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.
2. The statutory predicates for the relief hereinafter requested are Section 105 of the Bankruptcy Code and Rule 9019 of the Federal Rules of Bankruptcy Procedure.
3. On October 9, 2020, Debtor filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code.
4. Subsequent to Debtor’s bankruptcy filing, Drs. Rebecca L. Watkins (“RLW”), Renee L. Kalp (“RLK”), and Ronald E. Hand (“REH”) (RLW, RLK, and REH collectively referred to as “Minority Shareholders”) filed a petition in Allegheny County Court of Common Pleas

regarding an action against Associated Dental Specialists, Inc., a Pennsylvania corporation (“ADS”). RLW, RLK, and REH are shareholders and employees of ADS via employment agreements with that entity.

5. The Minority Shareholders also entered an appearance and became involved in this bankruptcy case after filing the ADS action in the Court of Common Pleas.

6. As part of a larger resolution between the Minority Shareholders and ADS related to the various Court of Common Pleas matters, ADS, Dental Specialty Services, LLC, a Pennsylvania limited liability company (“DSS”), Employers Services of Pittsburgh, Inc., a Pennsylvania corporation (“ESP”), Ronald G. Linaburg (“RGL”), John G. Hischar (“JGH”) (ADS, DSS, ESP, RGL, and JGH collectively referred to as “ADS Parties”), and the Minority Shareholders, the Debtor and the Minority Shareholders agreed to mutual releases as more particularly set forth in the attached Mutual Release Agreements. A true and correct copy of the Mutual Release Agreements is attached hereto as Exhibit “A.”

7. Debtor has never asserted any individual claims against the Minority Shareholders, nor were any claims listed as an asset on his Schedules.

8. The Mutual Release Agreements contemplates the resolution of any matters asserted by RLW, REH, and RLK in this bankruptcy case.

9. The approval of the Mutual Release Agreements by this Court is required as a condition precedent to the effectiveness of the global settlement between the Minority Shareholders and the ADS Parties.

10. Debtor believes the Mutual Release Agreements is in the best interest of the estate and Debtor is requesting Court approval herein.

WHEREFORE, Debtor respectfully requests that this Honorable Court grant this Motion to Approve Mutual Release Agreements.

Respectfully submitted,

Dated: January 18, 2022

/s/Brian C. Thompson, Esquire  
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